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June 15, 2022

## Via ECF

Hon. Michael A. Hammer, United States Magistrate Judge U.S. District Court for the District of New Jersey Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07101

Re: Luke v. Town of Dover, et al., No. 2:21-cv-11233 (JMV) (MAH)

Dear Judge Hammer:

This firm represents the plaintiff, Cyprian Luke, in the above-referenced matter. On February 10, 2022, the Court issued an Amended Scheduling Order (ECF No. 16), including a June 15, 2022 deadline for the parties to raise any discovery disputes with the Court.

The parties are currently engaged in good faith settlement discussions as well as the exchange of discovery. Plaintiff respectfully requests a 30-day extension of all deadlines in the Amended Scheduling Order to facilitate the parties' current efforts.

Counsel for defendants, Roman B. Hirniak, Esq. and Steven K. Parness, Esq., have consented to this request.

Respectfully,

/s/ Vivake Prasad

c. All counsel of record, via ECF.